

45718

PRELIMINARY ASSESSMENT COVER SHEET
DYCOL CHEMICALS INC.
GAD07587738

A. HISTORY OF SITE

Dycol Chemicals Inc. at 1933 North Waring Road in Dalton, Georgia 30720 began operations in 1975. At the time of this writing the facility is in the process of closing their operations. The plant manufactured guar gum which is used in paper manufacturing, textile printing, as a fracturing aid in oil wells and as a thickener and emulsifier in food products. Some hazardous materials are used in the manufacturing process but the end product does not have hazardous characteristics. No hazardous wastes are generated at the facility, only rubbish and other non-hazardous wastes. This solid waste is disposed at the local landfill. In April 1985, a fire occurred at the facility in which some raw material was washed into a local stream by the water used to fight the fire. This runoff water is suspected of causing a fish kill. The Hazardous Waste Facility Permit Application for this site has been withdrawn and a small quantity generator status has been assigned to it.

B. NATURE OF HAZARDOUS MATERIALS

No hazardous waste is reported to have been generated from the production of guar gum, however, some of the raw materials did have corrosive properties. These products were stored inside the plant on a concrete surface.

C. DESCRIPTION OF HAZARDOUS CONDITIONS, INCIDENTS, PERMIT VIOLATIONS

There are no reported spills of material used in manufacturing guar gum. In April, 1985, a fire occurred at the facility and the EPA and EPD Emergency Response Teams were called to the site. Members of the EPA's Technical Assistance Team (TAT) reported that a fish kill had occurred in Farrar Branch, a stream below the plant, presumably from run-off water from the fire fighting operation. Members of EPA's TAT took air samples in the smoke plume and determined that the surrounding population was in no danger from organic vapors from the fire. Although some firefighting water left the site, an earthen dike was constructed to contain most of it. EPA's Emergency Response Cleanup Services (ERCS) contractor (HAZTECH) arrived on site and set up above ground metal holding tanks. The run-off water collected by the dikes was pumped into the tanks and reused to control the fire. After some discussion between federal and state representatives, it was agreed that the waste water could be treated and then applied to land owned by Dycol Chemical Company adjacent to the plant. Solid waste from the fire was disposed at the local landfill while hazardous waste removed from the site by HAZTECH was hauled to a secure hazardous waste landfill.

D. ROUTES FOR CONTAMINATION

Surface water run-off into Farrar Branch and infiltration through soil and into the groundwater may carry contaminants from the site.

(over)

E. POSSIBLE AFFECTED POULATION AND RESOURCES

The site lies north of the City of Dalton, GA, population 20,743. The area is served by a municipal water system however, shallow drinking water wells may be in the vicinity.

F. RECOMMENDATIONS AND JUSTIFICATIONS

Information provided by the Plant Manager, Mr. Bill Valencia, indicated that no hazardous wastes were generated at this facility. Waste resulting from the April 1985 fire was cleaned up by EPA's ERCS contractor in accordance with the Georgia Rules for Hazardous Waste Management. Therefore, a priority for Site Inspection of "NONE" is assigned to this site.

G. REFERENCE TO SUPPORTING DATA SOURCES

1. USGS Map, Dalton North Quadrangle (1972), 1:24,000 scale.
2. Letter dated February 2, 1983; regarding Request for Facility Status Change for Dycol, Inc., Dalton, Georgia, GAD075877738.
3. Trip Report dated April 10, 1985, Dycol, Inc., 1933 North Waring Road, Dalton, GA 30720, (404)259-3337.
4. Phone Conversation dated July 27, 1985 with Mr. Bill Valencia, Plant Manager, Dycol Chemicals, Inc. Dalton, GA 30720.

CPE/mcw016

*10-8-85 I concur with the
none assessment Ray Walker*



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
GA 0075877738

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Dycol Chemicals, Inc.		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 1933 North Waring Road			
03 CITY Dalton	04 STATE GA	05 ZIP CODE 30720	06 COUNTY Whitfield	07 COUNTY CODE 313	08 CONG DIST 09
09 COORDINATES LATITUDE 30° 49' 00.6"		LONGITUDE 084° 58' 10.4"			

10 DIRECTIONS TO SITE (Starting from nearest public road)
From the intersection of GA 71 & North Waring Road, proceed north on North Waring Road 1.7 miles. Site will be on the west side of the road.

III. RESPONSIBLE PARTIES

01 OWNER (if known) Dycol Incorporated		02 STREET (Business, mailing, residential) 10 FINDERNE AVE.			
03 CITY Bridgewater	04 STATE NJ	05 ZIP CODE 08807	06 TELEPHONE NUMBER 201-685-5202		
07 OPERATOR (if known and different from owner) Same as above		08 STREET (Business, mailing, residential)			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER ()		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN					

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)
☒ A. RCRA 3001 DATE RECEIVED: 11/19/80 MONTH DAY YEAR ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: _____ MONTH DAY YEAR ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 02/25/85 MONTH DAY YEAR <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION BEGINNING YEAR 1975 ENDING YEAR present <input type="checkbox"/> UNKNOWN			

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
Raw materials - caustic soda and adipic acid

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION
None

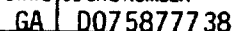
V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)
☐ A. HIGH (inspection required promptly) ☐ B. MEDIUM (inspection required) ☐ C. LOW (inspect on time available basis) ☒ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Mr. Bill Valencia		02 OF (Agency/Organization) Dycol Inc.		03 TELEPHONE NUMBER '404' 259-3337	
04 PERSON RESPONSIBLE FOR ASSESSMENT Charles P. Evans CPE		05 AGENCY DNR	06 ORGANIZATION EPD-RAU	07 TELEPHONE NUMBER '404' 565-7404	08 DATE 07/26/85 MONTH DAY YEAR

Fullfilled for ITS



EPA FORM 2070-12 (7-81)



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
GA D075877738

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

NA

01 ☐ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

NA

01 ☐ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

NA

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

NA

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

NA

01 ☐ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Fire control water was to be spray irrigated in accordance with the criteria for waste water treatment by spray irrigation adopted by the GA Environmental Protection Division. No soil contamination is expected.

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

NA

01 ☐ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

NA

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

NA



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

GA 0075877738

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

NA

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION (include name(s) of species)

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

NA

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

NA

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES
(Spills/runoff standing liquids/leaking drums)

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

NA

01 ☐ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

NA

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

NA

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

NA

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

NA

III. TOTAL POPULATION POTENTIALLY AFFECTED: None

IV. COMMENTS

None

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

EPD File - Dycol Chemicals, Inc., Dalton, GA GAD075877738
Phone conversation with Bill Valencia, Plant Manager, Dycol, Inc. - Dalton, GA

Mill Creek w/s #2
II

DALTON NORTH, GA.
SW/4 DALTON 15' QUADRANGLE
N3445—W8452.5/7.5

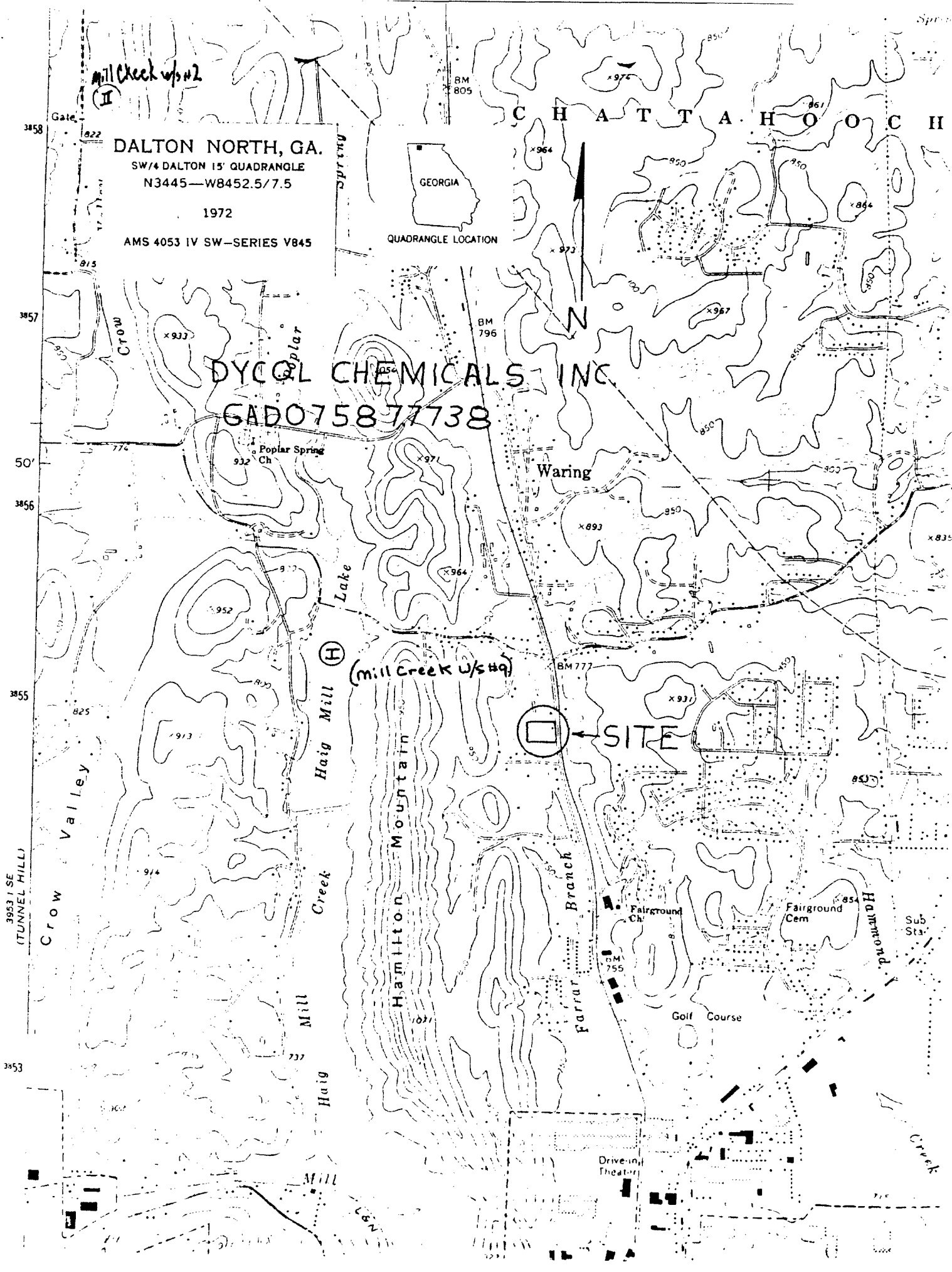
1972

AMS 4053 IV SW—SERIES V845



C H A T T A H O O C H

DYCOL CHEMICALS INC
GADO75877738





JOE D. TANNER
Commissioner

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

J. LEONARD LEDBETTER
Division Director

February 2, 1983

Mr. A. M. Samson, jr.
Associate Counsel
National Starch & Chemical Corp.
P. O. Box 6500
Bridgewater, NJ 08807

RE: Request for Facility Status
Changes for Dycol, Inc., Dalton,
GADO75877738

Dear Mr. Samson:

This will acknowledge receipt of your request for withdrawal of your application for a Hazardous Waste Facility permit.

Based on the information provided, withdrawal of your application is warranted and your permit application has been placed in our inactive files. As requested, your status has been changed to a small quantity generator and your EPA Identification Number has been retained.

Please be advised that withdrawal of your permit application invalidates any variance that you received to continue existing hazardous waste treatment storage or disposal during the permit review process and that based on our concurrence with your withdrawal request, the Federal Environmental Protection Agency will terminate your facility's interim status.

Should you wish to treat, store, or dispose of hazardous waste in the future, it will be necessary that a hazardous waste handling permit be issued, prior to the construction of such facilities, under authority of Section 8 of the Georgia Hazardous Waste Management Act and paragraphs .10 and .11 of Georgia's Rules for Hazardous Waste Management, Chapter 391-3-11.

If further clarification is needed on this matter, please feel free to contact Ms. Gwendolyn Glass at 404/656-2833.

Sincerely,

John D. Taylor, Jr.
Program Manager
Industrial & Hazardous Waste
Management Program

JDT:gk:2244C

cc: James H. Scarbrough
Moses N. McCall, III
File: National Starch & Chem. (Y)



J. LEONARD LEDBETTER
Commissioner

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION

270 WASHINGTON STREET, S.W.

ATLANTA, GEORGIA 30334

TRIP REPORT April 10, 1985

Site Name and Location: Dycol, Inc. 1933 North Warring Road, Dalton, Georgia
30720, (404) 259-3337

Trip By: Tim Cash *TJC*

Accompanied By: None

Date of Trip: February 25 and 27, 1985

Officials Contacted:

1. Mr. Bill Valencia, Plant Manager, Dycol, Inc. 1933 North Warring Road, Dalton, Georgia 30720
2. Mr. Gary Tomevi, Production Control Manager, National Starch and Chemical Company, Bridgewater, New Jersey 08807 (201) 685-5208
3. Mr. Carl Collins, Mr. Ron Kibble, Whitfield County Fire Department (404) 259-7433
4. Mr. Chuck MacPherson, USEPA, Emergency Response Control Section (404) 881-3931
5. Mr. Rob Siebenheimer, City of Dalton Utilities, (404) 278-1313

References: Investigative Spill Report, Trip Report confirming March 6, 1985 inspection by Howard Barefoot and Trip Report confirming March 13, 1985 inspection by Jack Dempsey

Comments:

1. At 8:21 a.m. on February 25, 1985, I was advised by Jimmy Kirkland, DDO that at 6:42 a.m., the Whitfield County Fire Department responded to a fire at the subject facility. The initial report indicated that chemicals were involved and that fire control run-off was entering a tributary to Mill Creek. USEPA originated the call.
2. I arrived on scene at 10:30 and found that Chuck MacPherson had already advised Dycol, Inc. that clean-up would be necessary and that Haz-Tech was en-route from Atlanta. The fire was still burning but had been brought under control. Run-off had been entering the tributary at two points as indicated on the attached map. A small earthen dike had been constructed at the most down stream point of discharge and a small concrete culvert through which the run-off was flowing at the most upstream point had been blocked. An underflow dam had been constructed between the two. A large plume of smoke was travelling northwesterly over a moderately populated area. All run-off was being contained, however, run-off had entered the creek from approximately 7:00 a.m. until 10:00 a.m.

April 10, 1985

3. The fire began as a result of a suspected boiler malfunction. Dycol, Inc. is involved in the processing of guar gum and guar gum products. The company receives the dried guar gum seed, grinds it into different sizes and blends it with various types and proportions of chemicals to achieve different grades. The chemicals that were involved in the fire are as follows:

Caustic Soda	2,000 pounds
Triethanolamine	1,500 pounds
Diethanolamine	243 pounds
Tektamer (polymer)	1,000 pounds
Sodium sulfate	3,400 pounds
Dowacil	260 pounds
Adipic acid	500 pounds
Therminal (heat transfer agent)	?
Gumase	223 pounds
Tullanox	66 pounds
Zinc sulfate	2,800 pounds
Borax	700 pounds
Potassium sorbate	300 pounds
Boric acid	?

The majority of materials involved in the fire were either guar gum or guar gum products. The location of materials and products in the building are indicated on the attached map. It was suspected initially that most of the above listed chemicals were located in the cage area. An inspection of this area indicated that this area had burned intensely and that it had been doused heavily with water. Chuck MacPherson and I donned SCBA's and protective clothing and entered the building. Most of the products, the company produces were in metal 55-gallon drums. Most of these had burned or were subjected to extreme temperatures. Most drums were opened and burning with the contents spilled out. A large stockpile of guar gum contained in bags was burning near the center of the building.

4. Members of EPA's Technical Assistance Team had reconnoitered the stream below the plant and determined that a fish kill had occurred. I radioed Calhoun Fisheries, and reported the fish kill. Members of the TAT team had also taken air samples in the smoke plume and determined that no danger was posed to surrounding population from organic vapors.
5. Clean-up strategy for the site was then discussed with Bill Valencia and Chuck MacPherson. The following determinations were made:
 - a. All drums or wastes in the cage area that could not readily be identified by visual observation would be classified as hazardous wastes. These wastes would have to be staged in a secure area and arrangements made for proper disposal. It was suspected that most of these wastes would have either been totally consumed by fire or washed away by fire control water.

April 10, 1985

- b. All other drums and stockpiled guar gum in the building could be disposed of as solid waste. Mr. Mack Bellew, Manager, Dalton Sanitary Landfill was on-site and stated that he would require approval from EPD prior to receipt of the wastes by the City.
 - c. Disposal of the wastewater, however, came under dispute between EPA and EPD. Mr. MacPherson had advised Haz-Tech that a wastewater treatment system should be brought to the site so that run-off could be treated and discharged to the stream. The system consisted of a mixed media filter, sedimentation/flocculation and an activated carbon filter. I informed Mr. MacPherson that this discharge could not be permitted under the Georgia Water Quality Control Act. I informed Mr. MacPherson that his proposal to treat and discharge the wastewater would have to be reviewed but that all alternatives would be considered.
6. Haz-Tech arrived at the site at approximately 11:30 a.m. Plastic lined, above ground metal holding tanks were assembled and run-off collected in the dikes was pumped to the tanks. The wastewater treatment system was also set up and a large tanker truck was brought on-site. At this point, no fresh water was applied to the remaining fire. Water which had already been collected was pumped from the tanks for fire control. Front end loaders were also brought in to remove parts of the building and begin removing drums and waste. A large roll-off container was on-site to store drummed and loose guar gum and gum products until arrangements for disposal could be made.
7. I then inspected several points along Farrar Branch below the plant and observed several pockets of dead or distressed fish. Mike Spence from Game and Fish Division arrived and conducted a pick-up of dead fish along the creek. The visual condition of the creek had no unusual appearance, although turbidity was high due to periodic rainfall throughout the day. Mr. Spence stated that he would return to the site the next day and continue the pick-up. I left the scene at approximately 5:30 p.m. to return home. Upon leaving, I determined that the site was stabilized and that no imminent threat was evident.
8. I returned to the site on February 27, 1985 with a letter of approval from John D. Taylor to allow for the non-hazardous solid wastes to be disposed of at the City of Dalton Sanitary Landfill. I delivered a copy of the letter to Mr. Mack Bellew. I then met with Mr. Gary Tomevi who was representing Dycol's parent company. Haz-Tech was using a grappling boom to remove drums individually from inside the building in the cage area. The drums were being quenched with water and emptied in a pile. The drums were identified as containing guar gum products only. All drums suspected of containing "hazardous wastes" had been removed, taken to a graded staging area and placed on plastic.

An inspection of these drums indicated that many of them also contained guar gum. Several of these drums were still smoldering. Mr. Tomevi was advised to completely extinguish all drums in this area. Mr. Tomevi was also advised that if drums of guar gum in this area could be easily distinguished that they could be included with other solid wastes. The stockpile of guar gum still burned vigorously. Mr. Tomevi was advised that all efforts at this point should be concentrated on completely extinguishing all fires.

9. I informed Mr. Tomevi that discharge of the treated fire control run-off could not be discharged to Farrar Branch. I told Mr. Tomevi that he needed to contact the City of Dalton to see if the wastewater could be discharged to the City's POTW. It was estimated that approximately 50,000 gallons would have to be disposed of.
10. On February 28, 1985, I contacted Mr. Ron Siebenheimer of the City of Dalton Utilities who informed me that the City would not be willing to accept the wastewater unless each constituent could be identified and quantified. I informed Mr. Siebenheimer that the waste, at its worse, could contain only trace concentrations of any possible hazardous constituents due to the heavy dilution and burning. I informed Mr. Siebenheimer that I had spoken with Allan Hallum of the Water Quality Control Section, Municipal Compliance and Technical Support Unit and that the only parameters that would be required for analysis would be TOC, pH and oxygen uptake. A subsequent conversation with Mr. Tomevi confirmed that the City refused to accept the wastewater. Mr. Tomevi requested that land application of the wastewater be considered. He stated that Dycol owned seven acres adjacent to the plant that could be used for land application.
11. I then spoke with John Taylor, Jack Dozier and David Word concerning the possibility of land applying the wastewater. It was determined that land application would be feasible provided that it be done in an approved manner. Appropriate sections of the document "Criteria for Wastewater Treatment by Spray Irrigation, July 1978" were extracted and sent to Dycol along with a cover letter granting approval. The area to which the wastewater would be applied was a seven acre field adjacent to the plant covered with a heavy growth of fescue and gently sloping towards Farrar Branch at an approximate 2%-5% rate. After reviewing the spray irrigation criteria, it was determined that the site would be acceptable based upon those criteria.

Conclusions:

1. Emergency resolved. No further action by ERT required.
2. Dycol proceeding with clean-up in a cooperative and timely manner.
3. Additional follow-up required by Generator Compliance to ensure clean-up is completed.

TRIP REPORT-Dycol, Inc.

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April 10, 1985

Recommendations and Follow-Up Required:

1. Conduct follow-up to confirm that land application of wastewater is conducted in accordance with our recommendations.
2. Conduct follow-up upon completion of clean-up.

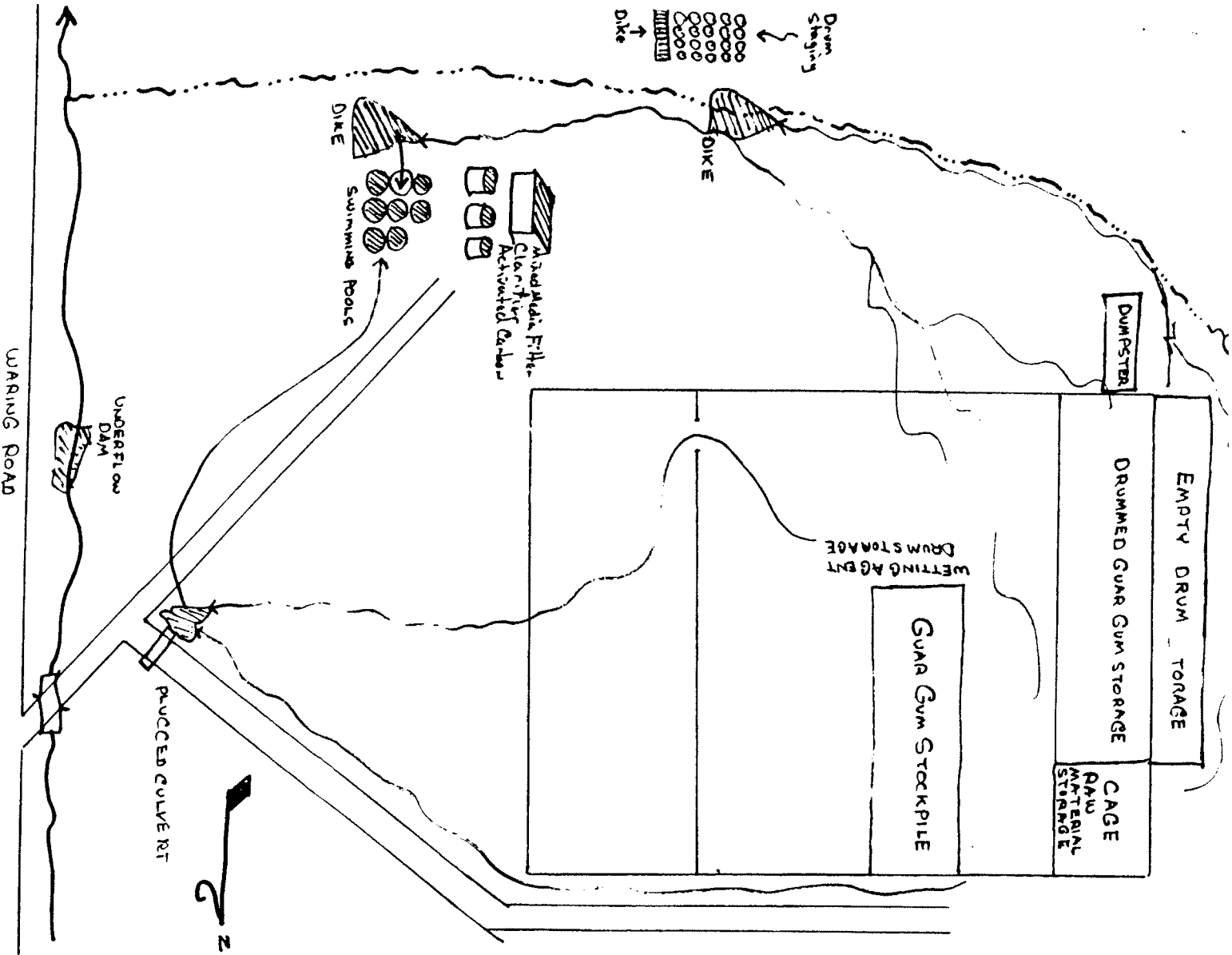
Photographs: None

Reviewed By: *L. Liner Hudson 4/12/85*

Attachments: One

TC:rw:040

File - Dycol, Inc. - (R)



PRELIMINARY ASSESSMENT
TELEPHONE CONVERSATION RECORD

Site Name: DYCOL CHEMICALS INC. I.D.# GAD075877738
Location Address: 1933 NORTH WARING ROAD, DALTON, GA 30720
Phone: (404) 259 - 3337.

Contact: BILL VALENCIA Title: PLANT MANAGER

Address: SAME

Phone: (404) 259 - 3337.

Authority: Section 3012 of CERCLA, Comprehensive Environmental Response, Compensation and Liability Act.

Facility has notified EPA via - RCRA 3001 site is in HWDMS
CERCLA 103c site is in NOTIS

Need Information concerning waste generation and disposal prior to Nov. 19, 1980.

How long has facility been in operation? SINCE 1975

What kind of wastes were generated and how much?

ONLY SOLID WASTE PAPER, PACKAGING, PALLETS
ABOUT 180 YD³/MONTH WAS GENERATED.

Was it disposed on site and where?

NO

Was it transported offsite and where?

YES, LOCAL LANDFILL

Was it treated and how?

NA

Have there been any past spills? Describe.

NOT IN 75-80 TIME FRAME

Date of call: 7/24/85 Time: 4:05 PM

(OVER)

Charles P. Finner

SOME HAZARDOUS MATERIAL IS USED IN ^{THE} MANUFACTURING PROCESS
BUT THE END PRODUCT IS NOT HAZARDOUS NOR IS ANY
HAZARDOUS WASTE IS GENERATED.

MR VALENCIA MENTIONED THAT THE PLANT IS NOW IN THE
PROCESS OF CLOSING DOWN.

ROUTING AND TRANSMITTAL SLIP

Date 3/18/85

TO: (Name, office symbol, room number, building, Agency/Post)

Initials

Date

1. Chute

Chute

9.1

2. Atten

3/8

3. Smith

3/8/85

4. Verine

5. Lenny

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Little

DO NOT use this form as a RECORD of approvals, concurrences, dispositions, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Lena Scott

Phone No. 3931

5041-102

U.S.G.P.O. 1983-421-529/320

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

ROUTING AND TRANSMITTAL SLIP

Date 3/18/85

TO: (Name, office symbol, room number, building, Agency/Post)		Initials	Date
1.	<u>Chen</u>	<u>Chen</u>	
2.	<u>Allen</u>	<u>G.M.</u>	<u>3/19</u>
3.	<u>Smith</u>	<u>AS</u>	<u>3/18</u>
4.	<u>Deane</u>		
5.	<u>Lenny</u>		

Action	File	Note and Return
Approval	For Clearance	For Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Little

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
<u>Lena Scott</u>	
	Phone No. <u>3931</u>

5041-102

U.S.G.P.O.: 1983-421-529/320

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE:

SUBJECT: Georgia's Response Program

Chief, Emergency and Remedial Response Branch
FROM: Waste Management Division

Alec Little
TO: Deputy Regional Administration

THRU: Thomas W. Devine, Director
Waste Management Division

I have attached a proposed answer to Mr. Harold Reheis's letter to you dated 3/6/85. Together with that proposed answer I am enclosing an appendix which is a set of documents reflective of the troublesome situations that we have had over the past few years with the State of Georgia. I think that this program has matured to the point that it is time that Mr. Ledbetter be informed as to some of EPD's activities. I think that Mr. McPherson's answer to the charges leveled against him, by Mr. Kirkland, is self explanatory. As the program manager, however, I recommend that we examine very carefully any agreement we sign with Georgia. As you are aware, we have the prime responsibility under the law to respond to emergencies. The recent GAO report just released two weeks ago insists that EPA do more in Immediate Removal than they have in the past. In fact, the suggestion is that much more of the fund money be spent in that area. I would also recommend that we wait until the new Regional Administrator is on board and totally informed before we sign a SEA Agreement with the State of Georgia under these circumstances and those that have preceeded this event.

I would suggest that in support of my position that EPD has done a poor job in emergency response can be confirmed by calling Capt. Scott Millsap head of Dalton's HAZ MAT Team at 404/278-7363. During the event outlined by Mr. Kirkland, Capt. Millsap came to both Chuck McPherson and Chuck Pietrosewicz wanting to discuss EPD's terrible performance in responding to their needs. Also Mr. James Cook, Assistant Director of the Atlanta/Fulton County Emergency Management Agency, may have additional comments regarding EPD's program.

The partial file that is attached does more of the same.

Finally, I want the record to show that over the years EPD has repeatedly treated me and my staff in this typical unprofessional manner. Just two weeks ago Reheis and Taylor were in Tom Devine's office complaining about "our" not keeping them notified about site work. I and my staff are sick and tired of this --- one way --- start at the top --- unjustified criticism.

Al J. Smith



UNITED STATES
ENVIRONMENTAL PROTECTION
AGENCY
REGION 4
ATLANTA, GEORGIA

File #	Pyrol Chemicals
Date	9.1
Page	

ALEC LITTLE
Deputy Regional Administrator

3/7

Tom Devine

I intend to call
Reheis first, as we
are about to OK the
SEA issue which would
call for resolving with
my involvement.
before going to Dalton. Did we contact EPD
Ale



~~JOE D. TANNER~~
Commissioner

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION
270 WASHINGTON STREET, S.W.
ATLANTA, GEORGIA 30334

J. LEONARD LEDBETTER
Division Director

March 6, 1985

Mr. John A. Little
Deputy Regional Administrator
EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Alec:

The enclosed in-house memo is from the manager of EPD's Emergency Response Team. Jimmy Kirkland is a level-headed and mature individual with a lot of experience in this business, and I respect his opinions. I realize there are two sides to most stories, and EPA's version of this may be different from EPD's, but this does indicate existence of a problem that neither EPA nor EPD needs. This is an example of the type of situation that led us to the selection of the SEA issue on Emergency Response. I think we need to proceed as rapidly as possible to develop procedures that we pointed out in the SEA so this kind of thing doesn't happen again.

I will call you in a few days to set up a meeting to discuss how to improve our mutual emergency response activities.

Sincerely,

A handwritten signature in cursive script, appearing to read "Harold".

Harold F. Reheis, P.E.
Assistant Director

HFR:mg
Enclosure
cc: Tom Devine
J. Leonard Ledbetter



~~XXXXXXXXXX~~

Commissioner

J. LEONARD LEDBETTER

Division Director

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION

270 WASHINGTON STREET, S.W.

ATLANTA, GEORGIA 30334

March 1, 1985

M E M O R A N D U M

TO: Jim Setser
FROM: Jimmy Kirkland *JK*
SUBJECT: Dycol Incident

The ERT received a call on 2/25/85 reporting a chemical fire at the Dycol Chemical Co. in Dalton. Tim Cash, LPB, responded. When he arrived, EPA was already there. Dycol promptly hired a contractor to clean up the chemicals released from 15-20 fifty-five gallon drums and to treat 50,000-60,000 gallons of contaminated runoff water.

As soon as sufficient facts were available, cleanup and disposal discussions began. Initially, Dycol agreed to treat the runoff water by running it through a multi-step filtration process which included activated carbon and then discharging the treated water into the City of Dalton WWTP. However, negotiations with the City of Dalton resulted in the rejection of this method of disposal. Next, EPD evaluated and approved the land application of the filtered runoff water. The chemicals from the drums will be disposed of at an approved hazardous waste disposal facility.

During the entire course of the disposal discussions Chuck McPhearson, the EPA representative, had an antagonistic attitude about the way EPD was handling the situation. At one point, when in McPhearson's view EPD was not making sufficient progress obtaining permission from the City of Dalton to discharge into their system, he stated that he would make a couple of phone calls and straighten this matter out because it appeared the State had done all it could do.

Early in the cleanup/disposal discussions, McPhearson suggested the runoff water be discharged to the adjacent stream. When Tim Cash told McPhearson that we would not approve such a discharge, McPhearson disagreed with our position and said he would give EPD a little time to determine if such a discharge was legal. After the decision had been made to discharge to the Dalton WWTP or land apply the treated material, McPhearson decided to perform

MEMORANDUM

RE: Dycol Incident

March 1, 1985

Page 2

a demonstration. He purchased live fishing minnows and then subjected them to both the treated and untreated runoff water. Most of the minnows died. The purpose of this demonstration is unclear. However, as a result of this demonstration, DNR fisheries and local firemen expressed concern about how EPD was going to handle this runoff water.

McPhearson's activities at this incident were counterproductive to our efforts. This type of activity not only makes negotiations more difficult but reduces our credibility to the public.

The BDO usually has enough problems to deal with at a spill site without having to waste his valuable time dealing with this type of interference by EPA. This type of situation arises frequently. I am requesting that we initiate discussions with the appropriate EPA management to discuss and develop an agreement on the following issues:

1. The most effective utilization of State and Federal resources for responding to spills within Georgia
2. Which agency will make the cleanup and disposal decisions associated with a spill

JK:jc

cc: Harold Reheis



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

SAVED
9.1

Mr. Harold F. Reheis, P.E.
Assistant Director
Department Natural Resources
Environmental Protection Division
270 Washington St., S.W.
Atlanta, GA 30334

Dear Mr. Reheis:

I will address your letter dated March 6, 1985 by answering the concerns you expressed about Mr. McPherson's response efforts at the Dycol Incident, and then addressing your concerns about the missions of EPA's Response Program. However, I will emphasize now that your method of airing specific problems as examples has forced me to open a file of our own regarding specific problems we've had with EPD. This file is enclosed for your examination.

Our account of the Dycol Incident is as follows:

On February 25, 1985 our office received a phone call from the Whitfield County Fire Department concerning a fire at the Dycol Facility. The fire department was asking for advice on what they should attempt to do in regard to the chemical nature of the materials involved. After some general recommendations to the fire department concerning initial response measures, Mr. Shane Hitchcock of our staff then notified EPD's duty officer, Mr. Jimmy Kirkland. Mr. Kirkland stated they had already been notified and had someone in route to the fire. This points out that EPD did not notify EPA as they have repeatedly agreed to do. Here I think it is important to emphasize Mr. Kirkland's comment about EPA already being there (on scene) when Tim Cash, EPD, arrived. As Mr. Kirkland's statement reads "Dycol promptly hired a contractor to clean up the chemicals... and treat 50,000-60,000 gallons of contaminated runoff water." EPA not EPD is responsible for these items being addressed. EPA not EPD offered immediate advice (over the phone) to the fire department about containing the runoff so that further environmental degradation would not occur. EPA recommended that a qualified contractor be hired that could aid in containing and treating this water. All of this advice came as quickly as possible based on the facts that were provided to Mr. McPherson.

In regard to Mr. Kirkland's evaluation of Mr. McPherson's attitude, I can only assume since Mr. Kirkland was not involved with Mr. McPherson that Mr. Kirkland is summarizing from a report or comments generated by Tim Cash. In that light I can only state that Mr. McPherson has always been an objective and forthright individual—one who considers the opinions of others and all options for containment, cleanup, and treatment and then based on that information promptly remedies the situation. Our response efforts often involve a discussion with the Regional Response Team (RRT), and in that discussion all response options should be discussed and the pros and cons of each option measured.

Mr. McPherson also has discovered through conversations with Tim Cash, EPD, that Mr. Kirkland failed to edit his memo to Mr. Setser concerning several items. Specifically, Mr. Cash commented that Mr. McPherson "did not" have an antagonistic attitude and he, Tim, "made no comment about the minnow test to Mr. Kirkland." Mr. Cash also asked Mr. Kirkland to edit these items from the memo since they were not representative of the response effort by EPD and EPA. Mr. Kirkland, as you have read, chose not to take Mr. Cash's advice.

Mr. Kirkland further states in his memo that Mr. McPherson "would make a couple of phone calls because it appeared the state had done all it could do". Mr. McPherson offered to make these phone calls for several reasons. One, the phone calls were not in the same light as the memo relates. He made them to aid in the cleanup not to point out that EPA could/would take care of the problem since the State could not. Also Mr. McPherson was told by Mr. Cash and Mr. John Taylor, that the State was not on good relations with the city of Dalton. Daltons landfill and waste water treatment plant operator reiterated this relationship to Mr. McPherson as well. It was in this vein that Mr. McPherson stated he, EPA, could call the Dalton officials.

The statement concerning Mr. McPherson giving EPD time to study the legalities of a discharge is wrong. When informed of EPD's decision not to allow the discharge, the test involving the minnows had already been run. The test was run not to discredit EPD, but was run as an immediate test on the effectiveness of the onsite water treatment system. This test has been used for 15 years by EPA in spill situations. Mr. Kirkland's light treatment of this technique reflects his training as a lawyer and engineer. The local firemen expressed more concern over EPD's lack of response management and expertise.

As to the fact that Mr. McPherson disagreed with EPD's position concerning discharging the treated water, EPD turned the treated discharge down before looking at any analytical data on what the system could yield. Mr. McPherson as would anyone who is familiar with what a treatment system of this kind could accomplish would wait until such data is available before rendering a decision on the treatment system.

Finally you regard Mr. Kirkland as being "level-headed and a mature individual with a lot of experience in this business". EPA feels the same way about Mr. McPherson. Mr. McPherson has been involved in full time emergency response work with EPA for over four years. During that time he has logged many hours in emergency response. He has written several papers on the subject as well as given numerous training courses regarding response management, monitoring equipment, site safety, and other response related concerns. The agency and myself value and trust his opinions fully in regard to emergency response decisions.

My reply to the second issue is one of more far reaching concern - the responsibilities of EPA's emergency program. Briefly, this program is carried out under the Comprehensive Environmental Response, Compensation and Liability Act of December 1980. This program is not wholly delegable to the states. Portions of the program may be carried out under formal cooperative agreements, but the emergency response program is not one of those programs. EPA has been mandated by the Congress of the United States to respond and mitigate, for the President, any release in excess of the Reportable Quantities specified in EPA's 40 CFR series. Our responsibilities are definite, and we have a full time staff/program to handle those mandated responsibilities. Members of my staff have on numerous occasions briefed Mr. Setser, EPD's Program Coordinator, on those roles/responsibilities. It appears that Mr. Setser has not either listened or passed any of this intimate knowledge down the line so our respective field personnel can carry out their missions.

If I can be of any further assistance please don't hesitate to call.

Sincerely yours,

John A. Little
Deputy Regional Administration

REGION: 04
STATE : GA

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L I S V 1.2

PAGE: 131
RUN DATE: 04/17/87
RUN TIME: 17:23:39

M.2 - SITE MAINTENANCE FORM

EPA ID : GAD075877738

ACTION: _____

SITE NAME: DYCOL CHEMICALS INC SOURCE: H _____

STREET : 1933 N WARING RD CONG DIST: 09 _____

CITY : DALTON ZIP: 30720 _____

CNTY NAME: WHITFIELD CNTY CODE : 313 _____

LATITUDE : 30/49/06.0 LONGITUDE : 084/58/14.0 _____

LL-SOURCE: R LL-ACCURACY: _____

SMBA : HYDRO UNIT: 03150101 _____

INVENTORY IND: Y REMEDIAL IND: Y REMOVAL IND: N FED FAC IND: N _____

NPL IND: N NPL LISTING DATE: NPL DELISTING DATE: _____

SITE/SPILL IDS: _____

RPM NAME: RAY WILKERSON RPM PHONE: 404-347-2234 _____

SITE CLASSIFICATION: SITE APPROACH: _____

DIOXIN TIER: REG FLD1: REG FLD2: 6 _____

RESP TERM: PENDING () NO FURTHER ACTION () PENDING () NO FURTHER ACTION ()

ENF DISP: NO VIABLE RESP PARTY () VOLUNTARY RESPONSE ()
ENFORCED RESPONSE () COST RECOVERY ()

SITE DESCRIPTION:

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
CERCLIS V 1.2

M.2 - PROGRAM MAINTENANCE FORM

SITE: DYCOL CHEMICALS INC

PROGRAM QUALIFIER: ALIAS LINK :

DESCRIPTION:

REGION: 04
STATE : GA

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L I S V 1.2

PAGE: 133
RUN DATE: 04/17/87
RUN TIME: 17:23:39

M.2 - EVENT MAINTENANCE FORM

SITE: DYCOL CHEMICALS INC
PROGRAM: SITE EVALUATION

EPA ID: GAD075877738 PROGRAM CODE: H01

EVENT TYPE: DS1

FMS CODE: EVENT QUALIFIER :

EVENT LEAD: E

EVENT NAME: DISCOVERY

STATUS:

DESCRIPTION:

ACTION: _

ORIGINAL

CURRENT

ACTUAL

START:

START:

START:

COMP :

COMP :

COMP : 08/01/80

____/____/____
____/____/____

HQ COMMENT:

RG COMMENT:

COOP AGR #

AMENDMENT #

STATUS

STATE %

0

REGION: 04
STATE : GA

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L I S V 1.2

PAGE: 134
RUN DATE: 04/17/87
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M.2 - EVENT MAINTENANCE FORM

SITE: DYCOL CHEMICALS INC
PROGRAM: SITE EVALUATION

EPA ID: GAD075877738 PROGRAM CODE: H01

EVENT TYPE: PA1

FMS CODE: EVENT QUALIFIER :

EVENT LEAD: S

EVENT NAME: PRELIMINARY ASSESSMENT

STATUS:

DESCRIPTION:

ACTION: -

ORIGINAL

CURRENT

ACTUAL

START:

START:

START: 09/17/85

COMP :

COMP :

COMP : 09/17/85

HQ COMMENT:

RG COMMENT:

COOP AGR #

AMENDMENT #

STATUS

STATE %

0

REGION: 04
STATE : GA

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L I S V 1.2

PAGE: 135
RUN DATE: 04/17/87
RUN TIME: 17:23:39

M.2 - COMMENT MAINTENANCE FORM

SITE: DYCOL CHEMICALS INC

EPA ID: GAD075877738

COM
NO COMMENT

ACTION

001 PART A- ON FILE

" - _____ "

" - _____ "